

U.S. EPA Proposes Updates to Reduce Methane & Other Harmful Pollutions from New Landfills



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July 17, 2014

Proposed Actions

- The EPA proposed two new actions on June 30, 2014.
- Updates to the New Source Performance Standard (NSPS) for new MSW landfills.
- Issued an Advance Notice of Proposed Rulemaking (ANPRM) for existing MSW landfills.

NSPS: Background Information

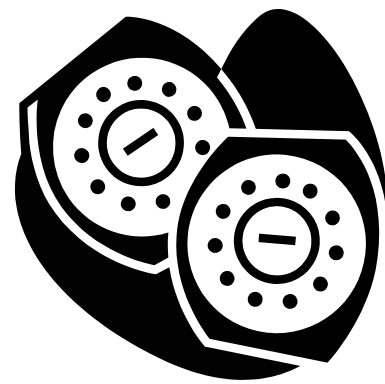
- Part of President's Climate Action Plan – Strategy to Reduce Methane Emissions
- Clean Air Act –> EPA reviews NSPS every 8 years
- EPA issued original NSPS in 1996.
 - Amendments in 2002 and 2006, but never finalized.
- Consent decree –> EPA needs to take final action by March 30, 2015

NSPS: Update the Standards of Performance of MSW Landfills

- EPA is proposing a new subpart, 40 CFR part 60, subpart XXX that updates the Standards of Performance for MSW Landfills.
- Applies to MSW landfills under construction, modification, or reconstruction.

NSPS: Summary of Major Revisions – Lowering of Threshold Proposal

- Same design capacity, but lower non-methane organic compounds (NMOC) emission threshold
- Current NSPS: Design capacity of 2.5 millions megagrams (Mg) and 2.5 million cubic meters must install and start up a gas collection control system within 30 months after landfill gas emissions reach or exceed a level of 50 Mg NMOC per year.
- Proposed subpart XXX: Same design capacity, but reduces the NMOC emission threshold to 40 Mg NMOC/yr.



NSPS: Summary of Major Revisions – Landfill Gas Treatment

- 2 issues being addressed.
 - Clarify that treated landfill gas is not limited to use as a fuel for stationary combustion device
 - Clarify what constitutes landfill gas treatment



NSPS: Summary of Major Revisions – Startup, shutdown & malfunction

- Startup, shutdown and malfunction: Standards would apply at all times
- Malfunction: propose recordkeeping and reporting requirement



NSPS: Summary of Major Revisions – Other Clarifications

- Improvements to criteria for exempting areas from collection and control,
- adding criteria for when an affected source must update its design plan,
- and clarifying when landfill owners or operators must submit corrective action timeline requests.

NSPS: Costs and Benefits



	Baseline NSPS Subpart WWW	Proposed NSPS Subpart XXX
Reduction of Mg NMOC/yr	610 Mg/yr NMOC	Baseline reduction + 79 Mg/yr NMOC (13 % increase)
Reduction of Mg Methane/yr	94,800 Mg/yr Methane	Baseline reduction + 12,300 Mg/yr Methane (13% increase)
Cost \$\$	\$2.7 million annually	Baseline Cost + \$471,000 annually

ANPRM: Background Information

- EPA Issues ANPRM as part of broader effort to reduce methane emission.
- EPA updates due to significant industry changes
- Updates apply to existing landfills that accepted waste on or after November 8, 1987 and ones that began construction, reconstruction or modification before the 2014 updates to NSPS.

ANPRM: EPA is seeking Feedback

▶ Clean Air Act

- Best system of emission reduction – each state will have a plan that demonstrates how landfills in that state will achieve the required reductions.

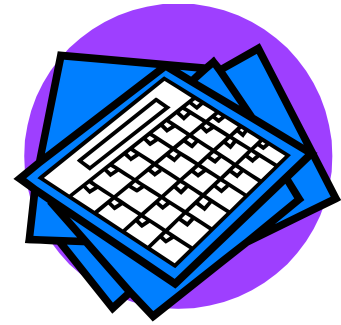
ANPRM: EPA is seeking Feedback (con't)

- ▶ EPA is seeking input on the ANPRM:
 - Extent to which methane addressed in guidelines
 - Possible changes to framework
 - Landfill design capacity
 - Nonmethane organic compounds threshold
 - Timing of installing/expanding gas collection systems
 - Emissions reduction through Technology and best management practices

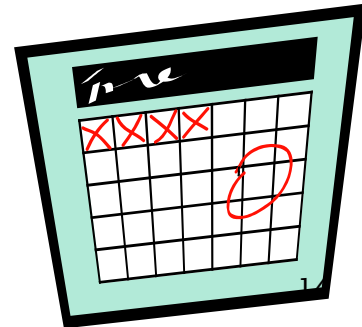
ANPRM: EPA is seeking Feedback (con't)

- ▶ EPA is seeking input on the ANPRM:
 - Alternative monitoring, reporting and other requirements
 - Implementation issues
 - Sufficient landfill gas treatment
 - Determining emissions from closed section of landfills

NSPS & ANPRM – Dates



- Federal Register Publish date – July 17, 2014.
- NSPS & ANPRM:
 - Public Comments – 60 days after published in Federal Register
- NSPS
 - Possible Hearing – August 12, 2014 (In Washington, D.C.)



Questions/Comments?

